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Resource Recovery
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Dioxin Screening Project - Follow-up to December 19 Meeting

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I want to thank E&E for the presentations of findings-to-date on the Alkali Lake, St. John's Landfill and Pasco Landfill. This memo is to resolve some of the issue raised at the December 19 meeting.

The first question was whether the sampling plans for these three sites should confirm the presence of dioxin on-site, or only look at possible migration routes off-site. It is difficult to provide specific guidance at this early stage of investigation; each site will have to be handled differently. The following summarizes some general directions.

On these three sites, E&E should try to identify the location of Rhone Poulenc wastes on-site, and to confirm whether the wastes contain dioxin. If files indicate other possible dioxin sources, wastes from these sources should be located and sampled as well. If the tests show no dioxin contamination, migration routes will not be studied. If the tests show positive identification of dioxins in the waste, migration routes will be analyzed.

It may be difficult to locate Rhone Poulenc wastes, particularly at St. John's Landfill and Pasco Sanitary Landfill. If this is a problem, we will ask E&E to make a recommendation as to sampling locations and we will then make a decision as to how to proceed.

You will recall from previous discussions that at the other two Tier 2a sites, ESSI and CSSI, migration routes will be the focus of the sampling plans.

A second question raised was whether RCRA is involved at St. John's Landfill or Pasco Landfill. The answer is no; the EPA RCRA program does not permit sanitary landfills. The state solid waste programs may address these landfills; E&E should pursue this issue with the states and be sure this project is carried out in concert with existing state policies.


The third question raised was which isomers to test for. E&E should review existing sources on dioxin/furan toxicity (including the work by Chris Rappa), review analytical capability and cost for the analysis of the 5-12 most toxic isomers. We will then decide which to look for.

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 We will be in touch the second week in January to discuss site visits, schedules, etc. Until then, happy holidays!

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